



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Kenneth D Smith
Naval Air Warfare Center, Aircraft Division - Trenton
P.O. Box 7176
Trenton, NJ 08628-0176

SEP 18 1998

Re: Draft Environmental Baseline Survey Phase II Supplemental Work Plan

Dear Mr. Smith:

The New Jersey Department of Environmental Protection (NJDEP) is in receipt of the Draft Environmental Baseline Survey Phase II Supplemental Work Plan dated September 29, 1997. Upon Review, NJDEP has several comments which have been enclosed for your convenience.

If you have any questions regarding this letter, please do not hesitate to contact me at (609) 633-1494.

Sincerely,

A handwritten signature in cursive script that reads "Donna L. Gaffigan".

Donna L. Gaffigan, Case Manager
Bureau of Federal Case Management

Enclosure

cc. William Hanrahan, BGWPA
Steven Byrnes, BEERA
William Lawler, USEPA
Steve Beebe, NorthDiv

Draft Environmental Baseline Survey

Phase II Supplemental Work Plan

1. Section 2 – Area of Concern (AOC) No. 11, Investigation Activities, page 3

The proposed well location is acceptable. The low flow sampling procedure is acceptable provided that the pump intake is placed at the middle of the screened interval and the ground water sample is collected through a pump. If a bailer is used to collect the ground water sample, then sampling shall conform to the Department's Field Sampling Procedures Manual.

2. Section 8 - AOC No. 35, Investigation Activities, page 7

- a. The proposed well locations are acceptable. The proposed sampling activities are acceptable provided the low flow sampling method considers the above comments concerning low flow sampling.
- b. The description of previous investigations indicates that surface soils at AOC 35 have been impacted by pesticides and metals, however, analyses for PCBs and metals are proposed. The confusion may be caused by Table 2. One of the table headings states "TCL PCBs, Method SW-846, 8080." Method 8080 is for PCBs *and* pesticides. This discrepancy must be corrected.
- c. Soil sampling is proposed along the southern and southwestern sides of this AOC. The report did not have information indicating whether soil sampling was ever conducted along the northern and northeastern sides of the wash rack. If not, it is recommended at this time.

3. Section 9 - AOC No. 36, Investigation Results, page 7

- a. The Navy must verify that concrete encountered in the two soil borings attempted in the driveway south of Building 31 on 13 December 1996 was not the top of UST vaults.
- b. It should be noted that the extent of coal ash and its constituents must be delineated for purposes of the Declaration of Environmental Restriction (DER).

4. Section 10 - AOC No. 60, Investigation Activities, page 8

- a. Soil sampling for PCBs is being conducted along perimeter fence lines at each substation based upon historical information. It must be verified that soils *within* each substation have not been impacted by PCBs from past leaks or poor house keeping.
- b. Again, it should be noted that the extent of contamination must be delineated for purposes of the DER.